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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA )

Case No. CR 06-0180 CRB

16 v. )

17 SUN WOO LEE; YEONGHO KANG; and  
18 YOUNG WOO LEE,

19 Defendants. )

STIPULATED NOTICE  
OF RELATED CASES  
IN A CRIMINAL ACTION;  
and PROPOSED ORDER

20 UNITED STATES OF AMERICA )

21 v. )

22 D.S. KIM, C.K. CHUNG, K.C. SUH, and  
23 C.Y. CHOI,

24 Defendants. )

Case No. CR 06-126 PJH

25 UNITED STATES OF AMERICA )

26 v. )

27 ELPIDA MEMORY, INC.,

28 Defendant. )

Case No. CR 06-0059 PJH

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[CAPTION CONTINUES ON NEXT PAGE]

UNITED STATES OF AMERICA

v.

SAMSUNG ELECTRONICS COMPANY,  
LIMITED and SAMSUNG SEMICONDUCTOR,  
INC.,

Defendants.

Case No. CR 05-643 PJH

UNITED STATES OF AMERICA

v.

HYNIX SEMICONDUCTOR INC.,

Defendant.

Case No. CR 05-249 PJH

UNITED STATES OF AMERICA

v.

INFINEON TECHNOLOGIES AG,

Defendant.

Case No. CR 04-299 PJH

UNITED STATES OF AMERICA

v.

T. RUDD CORWIN; HEINRICH FLORIAN;  
GÜNTHER HEFNER; and PETER SCHAEFER,

Defendants.

Case No. CR 04-397 PJH

Under Crim. L. R. 8-1, the United States and Sun Woo Lee, Yeongho Kang, and Young Woo Lee ("Samsung Defendants"), file this Stipulated Notice of Related Cases in a Criminal Action for this criminal case, United States v. Sun Woo Lee, Yeongho Kang, and Young Woo Lee, to six previously filed criminal cases assigned to Judge Phyllis J. Hamilton, United States v. D.S. Kim et al., CR 06-126 (PJH), United States v. Elpida Memory, CR 06-0059 (PJH), United States v. Samsung Electronics Company, Limited and Samsung Semiconductor, Inc., CR 05-643 (PJH), United States v. Hynix Semiconductor Inc., CR 05-249 (PJH), United States v.

1 Infineon Technologies AG, CR 04-299 (PJH), and United States v. T. Rudd Corwin et al., CR  
2 04-397 (PJH). The United States and the Samsung Defendants jointly request relating this case  
3 to Judge Hamilton.

4 A chronological history of these related criminal cases follows. On September 15, 2004,  
5 the United States filed an Information in United States v. Infineon Technologies AG, charging  
6 Infineon with participating in a conspiracy to fix the prices of DRAM sold to certain computer  
7 manufacturers. On October 20, 2004, Infineon pled guilty for participating in the price-fixing  
8 conspiracy and was sentenced to pay a \$160 million fine before Judge Hamilton. On December  
9 2, 2004, the United States filed an Information in United States v. T. Rudd Corwin et al.,  
10 charging four individual defendants with participating in the same price-fixing conspiracy in the  
11 DRAM industry. On December 15, 2004, Judge Hamilton sentenced each of the four  
12 individuals. On April 21, 2005, the United States filed an Information in United States v. Hynix  
13 Semiconductor Inc., charging Hynix with participating in the DRAM price-fixing conspiracy.  
14 On May 11, 2005, Hynix pled guilty for participating in the price-fixing conspiracy and was  
15 sentenced by Judge Hamilton to pay a \$185 million fine. On October 13, 2005, the United  
16 States filed an Information in United States v. Samsung Electronics Company, Limited and  
17 Samsung Semiconductor, Inc., charging Samsung with participating in the DRAM price-fixing  
18 conspiracy. On November 30, 2005, Samsung pled guilty for participating in the price-fixing  
19 conspiracy and was sentenced by Judge Hamilton to pay a \$300 million. On January 30, 2006,  
20 the United States filed an Information in United States v. Elpida Memory, Inc., charging Elpida  
21 with participating in the DRAM price-fixing conspiracy. That case too was ordered related and  
22 sentencing before Judge Hamilton is set for March 22, 2006. Finally, on March 1, 2006, the  
23 United States filed an Information in United States v. D.S. Kim et al., charging four individual  
24 defendants with participating in the DRAM price fixing conspiracy. On March 15, 2006, Judge  
25 Hamilton sentenced each of the four individuals.

26 The Information against the Samsung Defendants charges that the Samsung Defendants  
27 participated in the DRAM price-fixing conspiracy. There are common events and occurrences  
28

1 alleged in this case and the six predecessor cases pending before Judge Hamilton.

2 The assignment of this case to Judge Hamilton is therefore likely to conserve judicial  
3 resources and to promote an efficient determination of the action.


4 Dated: March 22, 2006

5 Respectfully submitted,

6 SUN WOO LEE

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27  
28 Stipulated Notice of Related Cases  
CR 06-0180 CRB

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3 resources and to promote an efficient determination of the action.

4 Dated: March 22, 2006

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6 SUN WOO LEE

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

SUN WOO LEE, YEONGHO KANG, and  
YOUNG WOO LEE

Defendants.

Case No. CR 06-0126

**[PROPOSED] ORDER**

RELATED CRIMINAL CASES

This Court has considered the Stipulated Notice of Related Cases in a Criminal Action under Crim. L. R. 8-1, jointly filed by the United States and defendants Sun Woo Lee, Yeongho Kang, and Young Woo Lee. Because the assignment of United States v. Sun Woo Lee, Yeongho Kang, and Young Woo Lee, to Judge Phyllis Hamilton is likely to conserve judicial resources and promote an efficient determination of the action, it is ordered that this case is transferred to Judge Hamilton.

Date: March 28, 2006





**CERTIFICATE OF SERVICE**

I, Niall E. Lynch, certify:

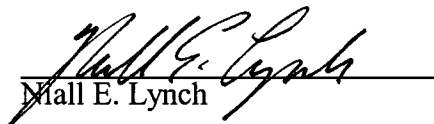
That I am a citizen of the United States and am employed by the U.S. Department of Justice, Antitrust Division, at 450 Golden Gate Avenue, Room 10-0101, San Francisco, CA 94102; I am over the age of eighteen years; and am not a party to the within action.

That on March 24, 2006, I sent by fax and United States mail a copy of the following pleadings to each of the parties listed in the foregoing Stipulation.

**1. Stipulated Notice of Related Cases in a Criminal Action**

**2. [Proposed] Order on Stipulated Notice of Related Case in a Criminal Action**

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 24, 2006, at San Francisco, California.

  
Niall E. Lynch